

LANKLER SIFFERT & WOHL LLP

ATTORNEYS AT LAW

500 FIFTH AVENUE
NEW YORK, N.Y. 10110-3398
WWW.LSWLAW.COM

TELEPHONE (212) 921-8399
TELEFAX (212) 764-3701

November 17, 2021

BY ECF

The Honorable Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

We represent non-party John Fawcett in connection with the hearing that occurred before the Court on November 1 and 2, 2021. We respectfully submit this letter in response to the Court's November 15, 2021 order (ECF No. 7353) regarding three motions filed by the Kingdom of Saudi Arabia.

As to the motion seeking leave to file certain exhibits (ECF No. 7327), we have advised Saudi Arabia that we do not oppose acceptance of the exhibits, with the understanding that we reserve our arguments regarding the relevance of the exhibits. The remaining two motions for additional discovery (ECF Nos. 7322 and 7328) are not directed to Mr. Fawcett, and we accordingly take no position with respect to those motions. We note, however, that we dispute the arguments regarding Mr. Fawcett contained in ECF No. 7328. Our November 24 submission will address the arguments that Saudi Arabia has made as to Mr. Fawcett, including those made in that filing.

Respectfully submitted,

/s/ Michael Gerber
Michael Gerber

Lankler Siffert & Wohl LLP
Counsel to Non-Party John Fawcett

cc: All counsel of record (via ECF)